

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Ashton James Reese,)	Civil Action No. 3:13-cv-03040-TLW
)	
Plaintiff,)	
)	
v.)	ANSWERS TO LOCAL CIVIL
)	RULE 26.01 INTERROGATORIES ON
Richland School District Two, Dr.)	BEHALF OF DEFENDANT FIELDS
Baron R. Davis, in his official capacity)	
as principal of Spring Valley High)	
School, and Ben Fields, in his official)	
capacity as a Richland County)	
Deputy and School Resource Officer,)	
)	
Defendants.)	
_____)	

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, as amended, the following answers to Interrogatories are hereby submitted on behalf of the Defendant Ben Fields, in his official capacity as a Richland County Deputy and School Resource Officer:

1. State the full name, address and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

None.

2. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE:

The parties have demanded a jury trial.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE:

Not applicable.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE:

It would appear that the appropriate division is the Columbia Division, since the alleged incident that is the subject of this lawsuit occurred in Columbia, South Carolina and most of the parties reside or located in or near Richland County.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

This Defendant is unaware of any related action filed in the District of South Carolina.

6. If the Defendants are improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

This Defendant is properly identified upon information and belief.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE:

Not applicable.

DAVIDSON & LINDEMANN, P.A.

BY: s/ Robert D. Garfield
ROBERT D. GARFIELD
Federal I.D. No. 7799
Post Office Box 8568
Columbia, South Carolina 29202
T: (803) 806-8222
e-mail: rgarfield@dml-law.com

*Counsel for the Defendant Ben Fields, in
his official capacity as a Richland County
Deputy and School Resource Officer*

Columbia, South Carolina

December 13, 2013